

Brad L. Puffpaff WSBA No. 46434
Bountiful Law, PLLC
4620 200th St. SW, Suite D
Lynnwood, WA 98036

The Honorable Christopher M. Alston
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re:

Chapter 11

V.S. INVESTMENT ASSOC., LLC,

NO. **20-11541**

***EX PARTE APPLICATION FOR
ORDER AUTHORIZING
EMPLOYMENT OF REAL ESTATE
AGENT FOR THE ESTATE***

Debtor(s).

The Debtor in Possession, through its attorney Bountiful Law PLLC, apply to this Court for authority to employ Shawn Perry of Windermere Real Estate North, as real estate agent for their Chapter 11 bankruptcy estate and in support thereof states as follows:

1. On May 29, 2020, the above-named debtor filed a Chapter 11 bankruptcy petition in the United States Bankruptcy Court for the Western District of Washington at Seattle.

2. The Debtor desires to hire Shawn Perry of Windermere Real Estate North Inc., to sell real properties located at 2463, 2465, 2467, and 2469 South College Street, Seattle, WA 98144, on behalf of the estate on a 6% commission basis, subject to Court approval after notice and a hearing. Copies of the proposed listing agreements are attached as Exhibit A.

Application to Employ

Lawrence M. Blue, Attorney
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1 3. There are no known connections between Shawn Perry, and the debtor, creditors, any
2 party in interest, their respective attorneys and accountants, the United States Trustee, or any
3 person employed in the office of the United States Trustee other than as set forth above.

4 4. This application is supported by the Declaration of Shawn Perry filed herewith.

5 5. Debtor's Attorney cause a copy of this application to be delivered to the U.S. Trustee
6 by email on June 26, 2020. (See Declaration of Brad L. Puffpaff) The UST has indicated it has
7 no objection to filing the application ex parte. *Id.*

8 6. No notice to creditors or interested parties of this motion is required pursuant to 11
9 U.S.C. section 102(1) and FRBP 2002.

10 WHEREFORE, the Debtor applies to the Court for an order authorizing the employment
11 of Shawn Perry to list and sell property of the estate as described in this application as of the date
12 this application.

13 Respectfully Submitted:

14 DATED this 30th day of June 2020 .

Bountiful Law, PLLC

17 /S/ Brad L Puffpaff
18 Brad L Puffpaff WSBA #46434
19 Attorneys for Debtor

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